

**DEPARTMENT OF  
PUBLIC HEALTH AND HUMAN SERVICES**



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August 25, 2008

TO: All Supplemental Nutrition Assistance Program (SNAP) Manual Holders

FROM: Tammy Poppe, Supplemental Nutrition Assistance Program (SNAP) Officer  
Yvette Barnier, Supplemental Nutrition Assistance Program (SNAP) Officer

RE: Supplemental Nutrition Assistance Program (SNAP) Updates

Enclosed is the revised manual material for your Supplemental Nutrition Assistance Program (SNAP) policy manual. Please contact your Regional Policy Specialist if you have questions or concerns about the revisions and clarifications.

Unless otherwise indicated in the text of the manual material all policy in this mailing should be applied to:

1. Applications received in October;
2. Recertifications due in October for November benefits;
3. Six month reports due in October for November benefits; and,
4. Changes reported in October for November benefits (changes are acted on according to households reporting requirements).

**BULLETINS STILL IN EFFECT**

FS 58	FS 302-1	Eligible Alien Status (Special Immigrants)	04/21/08
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**BULLETINS TO BE REMOVED**

FS 57	402-1	Countable and Excluded Resources (Tax Rebate)	03/06/08
FS 59	103-5	Verification (Querying Computer Systems)	04/21/08
FS 60	105-1	Expedited Services (Authorizing Expedited Benefits)	04/28/08
FS 61	201-1	Household Composition (Dual Participation)	04/28/08
FS 62	101-1	Confidentiality (Investigators of Child/Elder Abuse)	05/29/08
FS 63	802-1	Geographic Waiver	08/04/08

## REMOVE FROM THE MANUAL

Manual Section	Subject	What/Date
0-1	Table of Contents	Entire Section/05/01/08
001	Gross and Net Monthly Income Standards	Entire Section/10/01/07
002	Thrifty Food Plan	Entire Section/10/01/07
101-1	Confidentiality	Entire Section/10/01/06
103-1	Application Filing/Interview Process	Entire Section/10/01/07
103-5	Verification	Entire Section/10/01/06
104-1	Application Approval or Denial	Entire Section/04/01/08
105-1	Expedited Services	Entire Section/04/01/06
201-1	Household Composition	Entire Section/05/01/08
304-1	Categorical Eligibility	Entire Section/04/01/05
402-1	Countable and Excluded Resources	Entire Section/04/01/08
501-1	Unearned Income	Entire Section/04/01/08
602-2	Deductions (Earned, Standard, Dependent Care and Child Support)	Entire Section/10/01/07
602-4	Deductions (Shelter)	Entire Section/10/01/07
802-1	Geographic Waiver	Entire Section/10/01/07
1504-1	Over Issuance	Entire Section/04/01/08

## POLICY CLARIFICATION UPDATES

### **0-1 Table of Contents**

#### **Supersedes FS 0-1 (05/01/08)**

Pages 1-4 - Updated section according to manual revisions.

### **001 Gross and Net Monthly Income Standards/Thrifty Food Plan**

#### **Supersedes FS 001 (10/01/07), FS 002 (10/01/07)**

Pages 1-3 - Updated the gross and net monthly income standards.

Page 2 - Added TANF Post Employment to the list of categorically eligible households.

Page 3 - Added FS 002 to section F001 and updated thrifty food plan standards.

### **101-1 Confidentiality**

#### **Supersedes FS 101-1 (10/01/06), FS Bulletin 62**

Page 1 - Updated legal references.

Page 1 - Removed investigators of child or elder abuse and neglect per state law (MCA 41-3-205) because federal regulations do not authorize the disclosure of confidential information to investigators of child or elder abuse.

### **103-1 Application Filing/Interview Process**

#### **Supersedes FS 103-1 (10/01/07)**

Page 2 - Added an application that is faxed to the OPA on a weekend or holiday is date stamped with the date the application was faxed and is used to determine eligibility. All fax machines in the OPA must be set to the correct time/date to ensure the accuracy of the date.

Page 6 - Added items placed in a Drop Box overnight or over a weekend should be date-stamped with the prior working day's date. Items placed in the Drop Box during a day's business hours will be date-stamped with that date.

Page 6 - Applications or items that are faxed to the OPA are date-stamped with the date they are received and are used to determine eligibility. All fax machines in the OPA must be set to the correct time/date to ensure the accuracy of the date.

### **103-5 Verification**

#### **Supersedes FS 103-5 (10/01/06); Bulletin FS 59**

Page 1 - Incorporated Bulletin FS 59 regarding the OPA Case Manager must query available computer systems such as SEARCHS (child support), MISTICS (wages and unemployment), SOLQ (social security), property search, etc. at application and recertification; and, the OPA Case Manager must query computer systems for information that is available and is pertinent to the case at the six month reporting period.

Page 1 - Added to the NOTE that an interview must be completed before expedited benefits can be issued.

Page 2 - Added the TEAMS notice F007, PEND APPL-REQUEST FOR INFO is sent after the interview.

### **104-1 Application Approval or Denial**

#### **Supersedes FS 104-1 (04/01/08)**

Page 1 - Changed the minimum benefit amount from \$10 to \$14.

### **105-1 Expedited Services**

#### **Supersedes FS 105-1 (04/01/06); Bulletin FS 60**

Pages 1-10 - Removed all references to postponing the interview.

Page 1- Moved date of discovery information to be included under Expedited Processing (pages 3-5).

Pages 2-3 - Added ABAWD and SNAP Employment and Training (SNAP E & T) information regarding expedited processing from FS 803-1.

Pages 3-5 - Added and changed policy from being able to postpone the expedited interview to the interview being required before expedited benefits can be processed for applications submitted in person or faxed, through the mail, and incomplete applications.

Page 5 - Added processing information that set an alert must be set to authorize the second month's benefits after TEAMS cut off so the household has the opportunity to participate by the first working day of the second month.

Pages 6-7 - Removed repeated information regarding notices F120 and F121, removed references to postponing interview, added household must reapply when required verification is not received by the end of the expedited period, added reverting the case to open and/or prorating from the date the required verification was received will result in ineligibility and an agency caused overpayment, and added if requested verification of expenses is received after the expedited period, the expenses are added to the case the month following receipt of the verification.

Page 8 - Added notices F120 and F121 informs household of benefit amount(s).

Page 9 - Removed OPA Case Manager must delete the system generated six month reporting requirement notice.

### **201-1 Household Composition**

#### **Supersedes FS 201-1 (05/01/08); Bulletin FS 61**

Page 2 - Incorporated Bulletin FS 61 by removing under Ineligible Households any required filing unit member is certified to receive commodities under the Food Distribution Program on Indian Reservations.

Page 4 - Incorporated Bulletin FS 61 by adding under Excluded Household Members individuals who received benefits in another state or commodities from the Food Distribution Program on Indian Reservations (FDPIR).

### **304-1 Categorical Eligibility**

#### **Supersedes FS 604-1 (04/01/05)**

Pages 1-5 - Added throughout the section that TANF Post Employment Program allows categorical eligibility.

Page 2 - Added from FS 104-1 households (including categorically eligible households) with three or more members passing the gross monthly income (GMI) and net monthly income (NMI) tests but are not eligible for a benefit amount are denied or closed.

Page 4 - Added when TANF Post Employment closes categorical eligibility status must be evaluated.

### **402-1 Countable and Excluded Resources**

#### **Supersedes FS 402-1 (04/01/08)**

Page 5 - Changed policy due to Farm Bill 2008 to exclude 529 and Coverdell educational savings plans and to code 'OX' on FIAC for SNAP.

Pages 9 -10 - Changed policy due to Farm Bill 2008 to exclude retirement accounts that were not previously excluded such as Individual Retirement Accounts, Keogh Plans, Simplified Employer Pension Plans and to code 'PE' for SNAP.

### **501-1 Unearned Income**

#### **Supersedes FS 501-1 (04/01/08)**

Page 2 - Added TANF Post Employment as countable unearned income under assistance programs.

Page 12 - Clarified pass through payments when households reside together and neither household owns the residence, a rent payment made from one household to another is exempt as pass-through shelter payment up to the full amount of rent billed. Reference made to 'Rental Income' in the section when a household owns the residence.

Page 13 - Clarified policy and example to show that the money the protective payee receives for services is countable earned income. If the protective payee keeps money that is not paid for protective payee services, it is countable unearned income.

Pages 20-21 - Removed information on TANF Work Support Payment.

### **602-2 Deductions (Earned, Standard, Dependent Care and Child Support)**

#### **Supersedes FS 602-2 (10/01/07)**

Page 2 - Updated the standard deduction for all households. Farm Bill 2008 increases the standard deduction for households including households with 3 or less members.

Page 3 - Removed references to dependent care being capped at \$200 for child under two years old and \$175 for an individual over two years old. Farm Bill 2008 eliminates the cap on the deduction for dependent care expenses.

### **602-4 Deductions (Shelter)**

#### **Supersedes FS 602-4 (10/01/07)**

Page 1 - Updated the capped shelter amount for households without a disabled or elderly member from \$431 to \$446.

### **802-1 Geographic Waiver**

#### **Supersedes FS 802-1 (10/01/08)**

Pages 1-2 - Incorporated Bulletin FS 63.

## **1504-1 Over Issuance**

### **Supersedes FS 1504-1 (04/01/08)**

Page 1 - Changed policy for not establishing claims on closed cases from \$25 to \$125 unless claim was the result of IPV, Program Compliance review, or if the claim was already established.

Pages 2-19 - Updated Claims and Recovery Unit to Claims and Investigations Unit.

Page 6 - Changed policy to establish claims for non-IPV household caused errors from six years to not to exceed 12 months from the month of discovery.

Page 6 - Added for an Intentional Program Violation (IPV) error, a claim must be established back to the month the IPV act occurred.

Page 10 - Clarified that the corrected information not actual information is used to establish an over issuance claim.

## **Policy/Procedure Tips & Reminders**

### **Six Month Reporting Household Changes to Change Reporting at Six Month Report Period**

A household is certified at application as a six month reporting household and is assigned a 12 month recertification period. There is a change in the household's circumstances. After completing the six month report the household changes to a change reporting household. The recertification date remains unchanged and must not be moved to a 24 month certification span until the household has its scheduled recertification.

### **Converting Minutes on Pay Stub to Decimal**

Some pay stubs show hours : minutes instead of converting the minutes to a decimal. If the pay stub shows 7.5 hours the minutes have been converted to a decimal. The amounts listed may be used to average hours. If the pay stub shows 7:30 (7 hours : 30 minutes), the amount must be converted to a decimal before they can be averaged. \*\*\*The clue is the colon.\*\*\* Divide the number of minutes shown on the pay stub by 60 to convert the minutes to a decimal (30/60 = .5).

### **Requesting Verification Cannot Be Limited to One Specific Document**

When requesting verification, the request should not be limited to one specific document type for verification. Many requests for verification are limiting the household to one specific type of document such as requesting the last two months of pay stubs when proof of income is needed to process the application. If verification of income is needed, proof of income such as the last two months of pay stubs if the household anticipates the same for the next prospectively budgeted period, an employer form, or a statement from the employer with the information needed to prospectively budget the income should be requested.

There are recent Fair Hearings rulings in the household's favor regarding applications that were incorrectly denied. When there is a request for verification and the household submits information but does not submit the exact documents that were requested, it shows the household is trying to cooperate with the application process. The OPA Case Manager must assist the household in obtaining the verification needed to process the application because the household is cooperating with the application process.



## **Verification of Spending Down Excess Resource**

If a household states they have spent down their resources but are unable to provide verification of how the money was spent down, the household's statement on how the resource was spent down is accepted. The information on how the money was spent down should be documented in case notes.

## **Motion to Dismiss Fair Hearing**

When OPA needs to file a motion to dismiss a fair hearing, OPA should contact Legal. OPA should not contact the Fair Hearings Office regarding the motion to dismiss because it is prohibited by law.

## **F007 Notice - PEND APPL-REQUEST FOR INFO**

Sometimes the F007 notice is being used like the Medicaid Application Pend notice. The process for food stamps is different than the Medicaid process. The F007 notice should not be sent to the household prior to the interview and should not be used to schedule an interview. Federal regulations require a notice be sent to the household after the interview requesting any information needed that was not provided at the interview.

## **First Month Denied Second Month Approved and Timely Issuance**

When the first month is denied and the second month is approved special handling must occur to insure timely receipt of benefits. In order to have the benefits issued on a daily cycle and to meet the requirement of the applicant receiving benefits within 30 days of the application date, the OPA Case Manager must delay authorization of benefits and set an alert to authorize benefits after cutoff. If authorized prior to cutoff or on the day of cutoff, the issuance will go into monthly issuance resulting in staggered benefit dates (delaying receipt of the benefit). Therefore, an alert must be set to authorize the second month's benefits after cutoff so that the household has the opportunity to participate within 30 days of applying.

**Example:** Joe applied for benefits 10/4/08 and is not eligible for October due to receipt of benefits in another state. He is eligible for benefits effective 11/1/08. November benefits were authorized on 10/23/08. Benefits were issued 11/5/08 as TEAMS issued as a monthly issuance rather than a daily issuance. In order for Joe to receive benefits within 30 days of 10/4/08, an alert should be set to authorize the case after cutoff which will then cause issuance to be a daily issuance.

This also applies to expedited processing. Expedited policy states when the household is not eligible for benefits for the initial month of application but is eligible for expedited processing the following month, the household must be given an opportunity to participate within seven calendar days from the date of the application or by the first working day of the second month, whichever is later. The application is denied the first month and processed the second month as expedited. An alert must be set to authorize the second month's benefits after cut off so that the household has the opportunity to participate by the first working day of the second month.

## Program Compliance Incorrect Denials/Closures and Negative Error Rate

Incorrect denials and closures are called negative errors. When a SNAP case is denied prior to the 30th day following the date of application, Program Compliance is required to cite the case as an incorrect denial. When the 30th day falls on a weekend or holiday the denial notice (F200) must be sent the following business day.

**Example:** Application is received 08/28/08 and verification of income is requested. The 30th day following the date of application is September 27th (Saturday). The OPA Case Manager must send the F200 on September 29th (Monday). Program Compliance must cite the case as a negative error if the denial notice was sent prior to September 29th.

## GUIDING QUESTIONS FOR REVISED MANUAL MATERIAL

101-1 Can the OPA disclose confidential information about a SNAP applicant or recipient household without notice or permission of the individual to investigators of child or elder abuse and neglect?

Answer: 101-1 pages 1-3

103-1 When an application or information is faxed to an OPA on a weekend or holiday, what is the date that it is date-stamped? Can a faxed application be used to determine eligibility?

Answer: 103-1 pages 2, 6

When items are placed in a Drop Box overnight or over a weekend, what is the date that the items are date-stamped?

Answer: 103-1 page 6

103-5 An individual applies for SNAP benefits and is receiving unemployment benefits but does not report it on the application. The unemployment benefits are discovered through a Program Compliance review. Is this considered an agency or client caused error?

Answer: 103-5 page 1

104-1 What is the new minimum benefit amount for a household with one or two members?

Answer: 104-1 Page 1

105-1 An application is submitted in person by a household and is screened eligible for expedited services. Can expedited benefits be issued and the interview postponed?

Answer: 105-1 pages 3-4

- 105-1 An application is received in the mail and is screened eligible for expedited services. The household is contacted and interview is scheduled for the next day. The household does not show for the interview. What should the OPA Case Manager do?
- Answer: 105-1 page 3
- 105-1 Does the household lose entitlement to expedited services if the household misses the initial interview scheduled by the OPA and does not reschedule the interview to meet the expedited seven day timeframe?
- Answer: 105-1 page 3
- 201-1 Household consists of Mom, Dad and two children. They apply for SNAP in October. Dad is the only member who received commodities for October and requested his commodities case close the end of October. Is the entire household ineligible for SNAP benefits since Dad received commodities or can eligibility be determined for mom and the two children?
- Answer: 201-1 page 4
- 304-1 Does TANF Post Employment Program allow the household who was receiving TANF cash assistance to continue to be categorically eligible for SNAP benefits?
- Answer: 304-1 page 1
- 402-1 Farm Bill 2008 excludes individual retirement accounts (IRA) as a resource. How should the IRA be coded on TEAMS to exclude it for SNAP benefits?
- Answer: 402-1 pages 9-10
- 501-1 Is income from the TANF Post Employment Program countable income for SNAP?
- Answer: 501-1 page 2
- 501-1 Household A owns the home and rents a room to Household B. Both households are receiving SNAP benefits as separate households. Household A has mortgage payment of \$400 (includes taxes and insurance). Household B is responsible for \$100 rent and half of the heating/cooling expense. What are the shelter/utility expenses for Household A? What are the shelter/utility expenses for Household B? What is the difference between this situation and a shelter payment that is excluded as income as a pass through payment?
- Answer: 501-1 page 15, 12



602-2 A household consists of mom and two children ages 4 and 6. The household is living with her mother as separate households and is paying her mother \$400 for dependent care. How much is the allowable dependent care expense?

Answer: 602-2 page 3

1504-1 An error was discovered and went back two years. It was determined the error was an inadvertent household caused error. How far back does a claim need to be established for the inadvertent household caused error? If it was determined the error was an intentional program violation, how far back does the claim need to be established?

Answer: 1504-1 page 6

1504-1 An error was discovered on a case that is currently closed. The error was not the result of an IPV, Program Compliance review, and has not been established. The amount of the claim is \$100, should the claim be established?

Answer: 1504-1 page 1